

**UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*

Debtors.¹

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

**NOTICE OF APPEARANCE AND REQUEST FOR
SERVICE OF NOTICES AND PAPERS**

TO THE HONORABLE COURT:

PLEASE TAKE NOTICE that pursuant to Rule 83D(a) of the Local Civil Rules of the United States District Court for the District of Puerto Rico, Rules 2002, 9007, and 9010(b) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), made applicable to these proceedings by Section 310 of the Puerto Rico Oversight, Management, and Economic Stability Act (“PROMESA”), 48 U.S.C. § 2170 *et seq.*, and sections 102(1) and 1109(b) of title 11 of the United States Code (the “Bankruptcy Code”), made applicable to these proceedings by Section 301 of PROMESA, Winston & Strawn LLP and Bobonis, Bobonis & Rodriguez Poventud hereby enter their appearance in the above-captioned Title III cases (the “Title III Case”) as co-counsel to

¹ The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567- LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780- LTS) (Last Four Digits of Federal Tax ID: 3747) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

Merrill Lynch, Pierce, Fenner & Smith Inc. (“MLPF&S”) and Merrill Lynch Capital Services, Inc. (“MLCS”). MLPF&S and MLCS hereby request, pursuant to Rules 2002 and 9010 of the Federal Rules of Bankruptcy Procedure, that all notice given or required to be given in these cases be served upon the undersigned counsel:

Jennifer L. Malin (*Pro Hac Vice*)²
Carrie V. Hardman (*Pro Hac Vice*)⁴
WINSTON & STRAWN LLP
200 Park Avenue
New York, NY 10166
Tel: (212) 294-6700
Fax: (212) 294-4700
Email: jmalin@winston.com
chardman@winston.com

Enrique G. Figueroa-Llinás³
USDC No. 201709
BOBONIS, BOBNIS & RODRIGUEZ
POVENTUD
129 de Diego Ave.
San Juan, Puerto Rico 00911-1927
Tel: (787) 725-7941
Fax: (787) 725-4245
Email: efl@bobonislaw.com

Joseph L. Motto
(*Pro Hac Vice* Admission Pending)
WINSTON & STRAWN LLP
35 W. Wacker Drive
Chicago, IL 60601
Tel: (312) 558-5600
Fax: (312) 558-5700
Email: jmotto@winston.com

PLEASE TAKE FURTHER NOTICE that, pursuant to 11 U.S.C. §1109(b), the foregoing request includes not only the notices and papers referred to in the PROMESA, the Bankruptcy Code, and the Bankruptcy Rules, but also includes, without limitation, orders and notices of any application, motion, petition, pleading, request, complaint or demand, whether written or oral, formal or informal, and whether transmitted or conveyed by mail, hand delivery,

² Jennifer L. Malin has previously appeared for MLPF&S. *See* Dkt. No. 6902 in 17-BK-3283. This notice is intended to effect Jennifer L. Malin’s appearance for MLCS.

³ Enrique G. Figueroa-Llinás has previously appeared for MLPF&S. *See* Dkt. No. 6902 in 17-BK-3283. This notice is intended to effect Enrique G. Figueroa-Llinás’ appearance for MLCS.

⁴ Carrie V. Hardman has previously appeared for MLPF&S. *See* Dkt. No. 6902 in 17-BK-3283. This notice is intended to effect Carrie V. Hardman’s appearance for MLCS.

facsimile transmission, e-mail, telephone, telegraph, telex or otherwise, which affects any of the above-captioned debtors and debtors in possession (the “Debtors”) or the property of or in the possession, custody or control of any of the Debtors or which is otherwise filed or given with regard to the above-referenced Title III Case.

PLEASE TAKE FURTHER NOTICE that neither this notice nor any later appearance, pleading, claim, or suit shall waive any right (1) to trial by jury in any proceeding so triable in the Title III Case or any case, controversy, or proceeding related to the Trial III Case; and (2) to any other rights, claims, actions, defenses, setoffs, recoupments, or remedies to which MLPF&S and MLCS (or any of their affiliates) is or may be entitled, in law or in equity, all of which rights, claims, actions, setoffs, recoupments and remedies are expressly reserved.

I HEREBY CERTIFY that I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all attorneys of record.

Dated: June 28, 2019

Respectfully submitted,

**MERRILL LYNCH, PIERCE, FENNER &
SMITH INC. and MERRILL LYNCH
CAPITAL SERVICES, INC.**

Jennifer L. Malin (*Pro Hac Vice*)
Carrie V. Hardman (*Pro Hac Vice*)
WINSTON & STRAWN LLP
200 Park Avenue
New York, NY 10166
Tel: (212) 294-6700
Fax: (212) 294-4700
Email: jmalin@winston.com
chardman@winston.com

Joseph L. Motto
(*Pro Hac Vice* Admission Pending)
WINSTON & STRAWN LLP
35 W. Wacker Drive
Chicago, IL 60601
Tel: (312) 558-5600
Fax: (312) 558-5700
Email: jmotto@winston.com

*Co-Counsel for Merrill Lynch, Pierce, Fenner &
Smith Inc. and Merrill Lynch Capital Services, Inc.*

/s/ Enrique G. Figueroa-Llinás

Enrique G. Figueroa-Llinás
USDC No. 201709
**BOBONIS, BOBONIS & RODRIGUEZ
POVENTUD**
129 de Diego Ave.
San Juan, Puerto Rico 00911-1927
Tel: (787) 725-7941
Fax: (787) 725-4245
Email: efl@bobonislaw.com

*Co-Counsel for Merrill Lynch, Pierce, Fenner &
Smith Inc. and Merrill Lynch Capital Services, Inc.*